IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Paul James Stowe Case No. 25-00968-KMS
Leslie Goins Stowe, Debtors CHAPTER 13

NOTICE

Debtors have filed papers with the court to be Employ Special Counsel.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Motion, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk U.S. Bankruptcy Court Dan M. Russell, Jr., U.S. Courthouse 2012 15th Street, Suite 244 Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to Debtors' attorney:

The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 (601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Application.

Date: June 3, 2025. Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469) Jennifer A Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

P.O. Box 13767 Jackson, MS 39236 601-500-5533

trollins@therollinsfirm.com

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Paul James Stowe Case No. 25-00968-KMS Leslie Goins Stowe, Debtors CHAPTER 13

APPLICATION TO EMPLOY SPECIAL COUNSEL

COMES NOW, Debtors ("Applicants"), by and through undersigned counsel, and pursuant to 11 U.S.C. §329, files this Application to Employ Special Counsel in the above Chapter 13 bankruptcy case and in support hereof would show unto the Court the following, to wit:

- 1. That Debtors represent that in the administration of the above referenced Debtors' estate, it has been determined necessary to employ Special Counsel to provide assistance with the prosecution of the Debtors' personal injury claim.
- 2. That the Debtors desire to employ Will Parker of Will Parker Law Firm to render services in connection with the claim as Special Counsel for the Debtors.
- 3. That it would be in the best interest of the estate that said firm be employed.
- 4. The attorney of Will Parker Law Firm has attached his affidavit hereto, stating that the attorney is a disinterested party to Debtors' estate. See Exhibit "A".
- 5. That in consideration of said representation, Special Counsel will receive a contingency fee and reimbursement of costs, the total of which will not exceed 50% of the total recovery.

WHEREFORE PREMISES CONSIDERED, Applicant prays that the Court enter an Order authorizing the employment of Will Parker of Will Parker Law Firm as Special Counsel for the Debtors under the provisions set forth herein and by Order of this Court.

Respectfully submitted,

Paul James Stowe, APPLICANT

BY:

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer A Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533
trollins@therollinsfirm.com

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Application were forwarded on June 3, 2025, to:

By USPS First Class Mail:

Paul and Leslie Stowe 2095A Hwy 11 and 80 Meridian, MS 39301

By Electronic CM/ECF Notice:

Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr.

[1	25-00906-NNS DKL 25 Filed 00/05/25 Efficied 00/05/25 14.14.22 Fage 4 01 0
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4	UNITED STATES BANKRUPTCY COURT
5	SOUTHERN DISTRICT OF MISSISSIPPI
6	IN RE: CASE NO: 25-00968-KMS
7	PAUL JAMES STOWE LESLIE GOINS STOWE DECLARATION OF MAILING CERTIFICATE OF SERVICE
8	Chapter: 13
9	
10	
11	On 6/3/2025, I did cause a copy of the following documents, described below,
12	Notice and Application to Employ
13	Affidavit
14	
15	
16	
17	
18	to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19	sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
21	com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.
22	Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
23	served electronically with the documents described herein per the ECF/PACER system. DATED: 6/3/2025
24	<u>/s/ Thomas C. Rollins, Jr.</u> Thomas C. Rollins, Jr.
25	Attorney at Law The Rollins Law Firm
26	702 W. Pine Street Hattiesburg, MS 39401
27	601 500 5533 trollins@therollinsfirm.com
28	

25-00968-KMS Dkt 25 Filed 06/03/25 Entered 06/03/25 14:14:22 Page 4 of 6

25-00968-KMS Dkt 25 Filed 06/03/25 Entered 06/03/25 14:14:22 Page 5 of 6 2 3 UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI 5 IN RE: CASE NO: 25-00968-KMS 6 **CERTIFICATE OF SERVICE** PAUL JAMES STOWE LESLIE GOINS STOWE **DECLARATION OF MAILING** Chapter: 13 8 9 10 11 On 6/3/2025, a copy of the following documents, described below, Notice and Application to Employ 12 Affidavit 13 14 15 16 18 were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient 19 postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth 20 The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above 21 referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief. 22 DATED: 6/3/2025 23 24 25 Miles Wood BK Attorney Services, LLC 26 d/b/a certificateofservice.com, for Thomas C. Rollins, Jr. The Rollins Law Firm 702 W. Pine Street 28 Hattiesburg, MS 39401

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25-00968-KMS Dkt 25 Filed 06/03/25 Entered 06/03/25 14:14:22 Page 6 of 6

USPS FIRST CLASS MAILING RECIPIENTS:
Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING NCRS ADDRESS DOWNLOAD CASE 25-00968-KMS SOUTHERN DISTRICT OF MISSISSIPPI MON JUN 2 14-27-32 PST 2025 EVELUDI

US BANKRUPTCY COURT
THAD COCHRAN US COURTHOUSE
501 E COURT STREET
SUITE 2300
JACKSON MG 39201 5036

(P)21ST MORTGAGE CORPORATION PO BOX 477 KNOXVILLE TN 37901-0477

AMERICAN FIRST FINANCE ATTN BANKRUPTCY 3100 OLYMPUS BLVD STE 300 COPPELL TX 75019-5472 CAPITAL ONE
ATTN BANKRUPTCY
PO BOX 30285
SALT LAKE CITY UT 84130-0285

COMENITY BANK
ATTN BANKRUPTCY
PO BOX 182125
COLUMBUS OH 43218-2125

CREDIT ONE BANK 6801 CIMARRON RD LAS VEGAS NV 89113-2273 FINWISE BANK CO BECKET AND LEE LLP PO BOX 3002 MALVERN PA 19355-0702 FORTIVA ATTN BANKRUPTCY PO BOX 105555 ATLANTA GA 30348-5555

GENESIS FS ATTN BANKRUPTCY PO BOX 4477 BEAVERTON OR 97076-4401 HR BLOCKPATHWARD ATTN BANKRUPTCY PO BOX 30674 SALT LAKE CITY UT 84130-0674 LVNV FUNDING LLC
RESURGENT CAPITAL SERVICES
PO BOX 10587
GREENVILLE SC 29603-0587

LVNV FUNDING ATTN BANKRUPTCY PO BOX 10497 GREENVILLE SC 29603-0497 METRO AMBULANCE SERVICE CO FRANKLIN SERVICE INC PO BOX 3910 TUPELO MS 38803-3910 NCB MANAGEMENT ATTN BANKRUPTCY 1 ALLIED DRIVE TREVOSE PA 19053-6945

NCB MANAGEMENT SERVICES INC ONE ALLIED DRIVE TREVOSE PA 19053-6945 (P)PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067

QUANTUM3 GROUP LLC AS AGENT FOR CF MEDICAL LLC PO BOX 788 KIRKLAND WA 98083-0788

QUANTUM3 GROUP LLC AS AGENT FOR CONCORA CREDIT INC PO BOX 788 KIRKLAND WA 98083-0788

SANTANDER CONSUMER ATTN BANKRUPTCY PO BOX 961245 FORT WORTH TX 76161-0244 SANTANDER CONSUMER USA INC 1601 ELM ST STE 800 DALLAS TX 75201-7260

SYNCHRONY BANK
ATTN BANKRUPTCY
PO BOX 965060
ORLANDO FL 32896-5060

UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6 430
JACKSON MS 39201 5022

(P) DAVID RAWLINGS
ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE

HATTIESBURG MS 39403 0566

LESLIE GOINS STOWE 2095A HWY 11 AND 80 MERIDIAN MS 39301-8910 DEBTOR

PAUL JAMES STOWE
2095A HWY 11 AND 80
MERIDIAN MS 39301-8910

EXCLUDE

THOMAS CARL ROLLINS JR
THE ROLLINS LAW FIRM PLLC
PO BOX 13767
ACKSON MS 39236 3767